

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

SAMI C. HORNER,

Defendant.

NO. MJ20-553

MOTION FOR DETENTION

The United States moves for pretrial detention of the Defendant, pursuant to 18 U.S.C. § 3142(e) and (f)

1. **Eligibility of Case.** This case is eligible for a detention order because this case involves (check all that apply):

- ☐ Crime of violence (18 U.S.C. § 3156).
- ☐ Crime of Terrorism (18 U.S.C. § 2332b (g)(5)(B)) with a maximum sentence of ten years or more.
- ☐ Crime with a maximum sentence of life imprisonment or death.
- ☐ Drug offense with a maximum sentence of ten years or more.

- 1 ☐ Felony offense and defendant has two prior convictions in the four
2 categories above, or two State convictions that would otherwise fall within
3 these four categories if federal jurisdiction had existed.
- 4 ☐ Felony offense involving a minor victim other than a crime of violence.
- 5
- 6 ☒ Felony offense, other than a crime of violence, involving possession or use
7 of a firearm, destructive device (as those terms are defined in 18 U.S.C. §
8 921), or any other dangerous weapon.
- 9 ☐ Felony offense other than a crime of violence that involves a failure to
10 register as a Sex Offender (18 U.S.C. § 2250).
- 11 ☒ Serious risk the defendant will flee.
- 12 ☐ Serious risk of obstruction of justice, including intimidation of a
13 prospective witness or juror.

14 2. **Reason for Detention.** The Court should detain defendant because there
15 are no conditions of release which will reasonably assure (check one or both):

- 16 ☒ Defendant's appearance as required.
- 17 ☒ Safety of any other person and the community.

18 3. **Rebuttable Presumption.** The United States will invoke the rebuttable
19 presumption against defendant under § 3142(e). The presumption applies because:

- 20 ☐ Probable cause to believe defendant committed offense within five years of
21 release following conviction for a qualifying offense committed while on
22 pretrial release.
- 23 ☐ Probable cause to believe defendant committed drug offense with a
24 maximum sentence of ten years or more.
- 25 ☐ Probable cause to believe defendant committed a violation of one of the
26 following offenses: 18 U.S.C. §§ 924(c), 956 (conspiracy to murder or
27 kidnap), 2332b (act of terrorism), 2332b(g)(5)(B) (crime of terrorism).
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